

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHERYL MILLER,

Plaintiff,

v.

Civil Action No.

WILLIAM BEAUMONT HOSPITAL dba

3:21-cv-12259

BEAUMONT HEALTH SYSTEM,

Defendant.

VIDEOCONFERENCE DEPOSITION OF

RENEE CARR

DATE: Tuesday, April 11, 2023

TIME: 10:30 a.m.

LOCATION: Remote Proceeding

2000 Town Center, Suite 1650

Southfield, MI 48075

REPORTED BY: Priscilla Gibbs, Notary Public

JOB NO.: 5866431

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF SHERYL MILLER:

AUSTEN J. SHEAROUSE, ESQUIRE (by videoconference)

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ON BEHALF OF DEFENDANT WILLIAM BEAUMONT HOSPITAL dba
BEAUMONT HEALTH SYSTEM:

ELYSE K. CULBERSON, ESQUIRE (by videoconference)

Jackson Lewis PC

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(248) 936-1900

ALSO PRESENT:

Jennifer Zinn, In-House Counsel (by
videoconference)

Roseanna Von Linsowe, Corporate Representative
for Beaumont (by videoconference)

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E X H I B I T S

NO.	DESCRIPTION	PAGE
	(None marked.)	

P R O C E E D I N G S

THE REPORTER: Good morning. My name is Priscilla Gibbs; I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 10:30 a.m.

This is the deposition of Renee Carr taken in the matter of Sheryl Miller vs. William Beaumont Hospital doing business as Beaumont Health Systems on Tuesday, April 11, 2023, via Zoom.

I am a notary authorized to take acknowledgments and administer oaths in Michigan. Parties agree that I will swear in the witness remotely.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by stenographic means; and
- shall constitute written stipulation of such.

1 At this time will everyone in
2 attendance please identify yourself for the record.

3 MR. SHEAROUSE: Austen Shearouse on
4 behalf of the plaintiff, Sheryl Miller.

5 MS. CULBERSON: Elyse Culberson
6 appearing on behalf of the defendant. Also present
7 with me this morning is Jennifer Zinn, defendant's
8 in-house counsel, as well as Roseanna Von Linsowe,
9 defendant's corporate representative.

10 THE REPORTER: Thank you. Hearing no
11 objections, I will now swear in the witness. Please
12 raise your right hand.

13 WHEREUPON,

14 RENEE CARR,
15 called as a witness, and having been first duly sworn
16 to tell the truth, the whole truth, and nothing but
17 the truth, was examined and testified as follows:

18 THE REPORTER: Thank you.

19 EXAMINATION

20 BY MR. SHEAROUSE:

21 Q Good morning. My name is Austen Shearouse,
22 and I represent Sheryl Miller in this matter. Just a
23 couple of quick things before we get started. Have
24 you ever had your deposition taken before?

25 A I want to say, like, 30 years ago.

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1 Q Well, yeah. We do them mostly by Zoom now.
2 So with that comes a little bit of issues for the
3 court reporter, especially due to the lag of
4 technology. So just make sure to give a couple of
5 seconds after my question finishes so that she has
6 adequate time to hear the question and take it down,
7 and I'm going to try to do the same for your answer.
8 I know inevitably we will still try to talk as if
9 we're in person. It's going to happen, but let's try
10 to do our best to make it easy for the court reporter
11 on that.

12 Along that same line, make sure all your
13 answers are verbal. So I know a tendency we have time
14 to point or talk with our hands or nod, or something
15 of that similar effect, but obviously the court
16 reporter can't take those down. So make sure any
17 answer you give is verbal.

18 If at any point in time you need to take a
19 break, I'm happy to do that. All I ask is that if
20 myself or Elyse has posed a question on the record
21 that we answer that question and then we take that
22 break. I don't have a problem with that. It's not an
23 endurance test.

24 If you don't understand any question that I
25 ask, please ask me to restate it or rephrase it. I'm

1 happy to do so. But if you answer a question, I'm
2 going to assume that you understood the question that
3 I was asking. So we'll go ahead and get started here.

4 Oh, lastly, if you don't know an answer to
5 the question, you can't remember, "I don't know" is a
6 completely acceptable answer. I don't want you to
7 guess at what you might remember, just if you can't
8 remember affirmatively one way or the other. That is
9 a completely fine. Can you state your full name for
10 the record, please?

11 A Renee M. Carr. That's C-A-R-R.

12 Q And what is your date of birth?

13 A 10/13/62.

14 Q And are you currently employed?

15 A Yes.

16 Q Where are you employed?

17 A Corewell Health, formerly Beaumont.

18 Q You said that was formerly Beaumont?

19 A Well, yeah. We merged so -- and our name
20 changed, so...

21 Q With that merge, did your position change at
22 all?

23 A No.

24 Q What position do you currently hold?

25 A I'm a supervisor for patient access

1 registration.

2 Q And when did you begin in that role?

3 A I want to say it was November 30th of 2020.

4 Q And then you've been working in that
5 position from November 30th of 2020 to the present
6 day?

7 A Correct.

8 Q And what are some of the responsibilities in
9 your role?

10 A Basically day-to-day, you know. We have
11 spreadsheets we have to do, audits of patient --
12 employees' work, making sure that they're capturing
13 the correct information daily, making sure each area
14 is staffed, multiple deposits.

15 Q So kind of general management over the
16 employees in the PAR?

17 A Yeah. Yes.

18 Q And do you ever supervise a Sheryl Miller?

19 A Well, they're all my employees. Yes.

20 Q Do you handle anything in relation to the
21 employees' time off requests?

22 A Yeah. We both -- me and the other
23 supervisors. Yeah. We do do that, yes.

24 Q And who are the other supervisors currently?

25 A The other supervisor with me is Ashley.

1 Ashley Fields.

2 Q And so you said that you two do have some
3 input on the time off requests?

4 A Well, let me just put it this way. They
5 have a cut off time that they have to submit that our
6 schedules are for four weeks out. So they have a
7 cutoff when they have to submit that, and then we time
8 stamp them as we receive them. And then you have to
9 -- you basically go in order of who put it in and
10 seniority.

11 Q So seniority is a part of that determination
12 on if two requests were conflicting for the same time
13 from two different employees?

14 A Typically, we allow two. And if we can
15 squeeze it, we do three. We don't really come across
16 that too often right now, but we try to accommodate
17 everyone.

18 Q But if there was a need for one of those
19 employees to work that shift they requested off, is
20 seniority the first determining factor you look at?

21 A Yes. That would be.

22 Q And is that a Beaumont policy?

23 A That's their Union policy.

24 Q And is your role with the time off requests,
25 is that similar to any role that you might have with

1 FMLA leave?

2 A Could you repeat that please?

3 Q Yes, of course. So we were talking about
4 your responsibilities with employees in the PAR on
5 their time off requests. Do you have similar
6 responsibilities when it comes to employees using FMLA
7 leave?

8 A FMLA leave. That's -- they're -- that's
9 even totally out of my scope. That is for the lead
10 specialist to handle that. So we don't handle any of
11 that.

12 Q Okay. So you don't handle anything related
13 to FMLA leave?

14 A No. No. If they -- if they call off FMLA,
15 there's no questions asked. And we just -- that's it.

16 Q And you said that the lead supervisor
17 handles FMLA leave?

18 A That would be an, I believe, an HR
19 specialist that handles, you know, like, if it's a
20 medical leave, FMLA leave. Us supervisors here do not
21 handle that.

22 Q Okay. Is there a particular person who you
23 direct people to when they're --

24 A Well, they have to enter -- now, they have
25 to enter into the system. And then once they do, then

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1 all that paperwork is sent to them to fill out by
2 their physicians or whatever.

3 Q And in your role as supervisor for the PAR,
4 do you take care of disciplinary matters for your
5 employees as well?

6 A Yeah. If it needs be, yes.

7 Q Is there a process that you go through when
8 considering discipline for an employee?

9 A When you're meaning discipline, what do you
10 mean by discipline?

11 Q I guess, is there a system that establishes
12 you do a verbal warning first, then a written warning,
13 then you can consider suspension. What's, like, the
14 general process for that?

15 A It would depend on what the incident was.

16 Q So the severity of the incident would
17 determine the response?

18 A I mean, they're going to get -- I'm, like,
19 trying to explain, like, yeah. They're going to get
20 written up if they -- if they've done something. This
21 is a very important position. So, I mean, you're
22 talking life and death when they come walking in our
23 EC doors. You know, you have to have that stuff,
24 correct. There is actions that have to be taken.

25 Q Have you ever had to write someone up during

1 your time at Beaumont?

2 A Yeah. Yeah.

3 Q Did you ever have to write up Ms. Miller?

4 A I was sitting in there basically, yeah.

5 We're all, you know -- because you usually --

6 generally, when it's something like that, you bring in

7 the Union steward. And the supervisors are present,

8 and you go over that, you know. Usually one of us

9 will speak. We don't all, you know. But I've been

10 present during that.

11 Q So you've been present during a disciplinary
12 meeting involving Sheryl Miller?

13 A Yep.

14 Q Were you taking that lead role in that
15 meeting?

16 A No.

17 Q Who was taking that lead role?

18 A I want to say -- well, Ashley, my co-worker.

19 Q Ashley Fields was taking the lead there?

20 A Well, she's Heaney now, but yes.

21 Q Okay. Was anyone else present during that
22 meeting besides you, Ms. Miller, the Union
23 representative, and Ashley Fields?

24 A Jennifer White, our manager.

25 Q Do you know Jennifer's title?

1 A Manager.

2 Q And do you remember the content of that
3 meeting?

4 A I'm not really for sure, you know. I mean,
5 I can just speculate that there's been -- or I
6 shouldn't even say "speculate." It has happened.
7 Wrong reg's, you know, or leaving your designated area
8 without proper coverage.

9 Q You're saying the two reasons that you would
10 have had these meetings specifically involving
11 Ms. Miller would have been due to wrong registration
12 issues and leaving designated areas?

13 A Yes.

14 Q Have you written anybody else up during your
15 time at Beaumont for these two things?

16 A Yeah. Wrong reg's.

17 Q Who else have you written up for this?

18 A Tammy Kolenda.

19 Q Is she the only one?

20 A I think she has been the only -- she was. I
21 think so.

22 Q So outside of Tammy Kolenda and Ms. Miller,
23 you have not had to write up anybody else during your
24 time at Belmont for wrong registration or leaving
25 designated areas?

1 A No.

2 Q And what was the result of these meetings
3 with Ms. Miller?

4 A The result of the meeting with what?

5 Q With Ms. Miller. These meetings that you're
6 referring to involving the wrong registration and
7 leaving designated areas.

8 A Well, like I said, we have the Union
9 present. We're present in there. I want to say
10 Ashley was the one that did all the talking. She just
11 -- she doesn't like it, you know. She doesn't want to
12 sign that she did it, but we have everything plain as
13 day, you know, what happened. There's a lot of work
14 that goes into a wrong reg that employees don't know
15 that we have to do when that happens. Because that is
16 serious. Like, somebody could get the wrong
17 medication, you know. There's just a lot that -- it's
18 life or death, you know. It can be.

19 Q And I know you stated that you started in
20 November 30th of 2020, correct?

21 A That is correct.

22 Q Had you ever looked at Ms. Miller's
23 employment file before in the dates preceding your
24 start with Beaumont?

25 A Never.

1 Q So you wouldn't know if Ms. Miller had ever
2 received a prior write up for wrong registration?

3 A No. I don't go back. I make my own
4 judgment with my, you know -- I don't go through
5 people's files.

6 Q And when someone receives a disciplinary
7 action like these write ups that we were talking
8 about, does that affect their ability to apply for
9 other jobs within Beaumont?

10 A No. I -- you know, it's actually a
11 discretion, and we would never, you know -- I would
12 never, you know. I want somebody to better
13 themselves, so I would never.

14 Q So there's no Beaumont policy to your
15 knowledge that prevents someone from applying if
16 they've had a disciplinary action or transferring
17 within six months?

18 A I believe it's just up to the manager. It's
19 up to your manager's discretion.

20 Q So it's up to the manager of the department
21 they're transferring from or transferring to? I'm a
22 little bit confused.

23 A It's -- it would be up to, like, say, if she
24 wanted to transfer to another department, it would be,
25 like, up to me whether or not to let her go.

1 Q Is that a similar requirement if someone
2 doesn't have a disciplinary action?

3 A Yeah. I -- well, all I can say is I've been
4 with Beaumont, Corewell, and I have never seen anybody
5 hold somebody back because of something. Everybody
6 can make mistakes.

7 Q Okay. And I and I understand that. But my
8 question is that if somebody -- so if somebody doesn't
9 have a disciplinary action on their record, is it
10 still up to the manager's discretion to allow them to
11 apply or transfer to another department?

12 A Well, there's -- we can't not say they can't
13 apply to anything and I've never had -- crossed that
14 issue where I had to deny somebody, let me put it that
15 way. I've never had that issue. I would never hold
16 an anybody back.

17 Q Right. And I understand. My question is,
18 like, we mentioned that it's up to the manager to
19 determine on someone who has a disciplinary action.
20 So my question is, does that same requirement apply if
21 you don't have a disciplinary action on your record?

22 A I would say probably not, but we don't do
23 that.

24 Q So the requirement of manager approval is
25 only if someone has a disciplinary action on their

1 record?

2 A You know what? I'm just going to say I
3 don't know because I've never encountered that.

4 Q Okay. Fair enough. Fair enough. And into
5 the specific disciplines that you were talking about
6 regarding Ms. Miller, you said one of them was for
7 leaving a designated area?

8 A Correct. She was scheduled in what we call
9 -- we call it "quick," and that's when our emergency
10 patients come in. It's where they arrive the patient.
11 Somebody has to be there. There is one person that
12 arrives the emergency patients, and she left her
13 station. And nursing, you know, said, "Where did she
14 go?" You know, you don't abandon your station. If
15 you have to go the restroom or anything, standard
16 protocol is you call and you get one of the other, you
17 know, employees to relieve you to go.

18 Q And on that day in question, do you know if
19 Ms. Miller was having any stomach issues?

20 A I'm not sure.

21 Q Do you know where Ms. Miller was during this
22 time that she was alleged to have been improperly away
23 from her station?

24 A I have no idea.

25 Q So if Ms. Miller said that she was feeling

1 sick and had to rush to the bathroom, you wouldn't
2 have any reason to disagree with that?

3 A She still should be calling somebody to
4 relieve her. She could have told the nurse, "You're
5 going to have to run over there. I'm not feeling
6 well," or what.

7 Q Okay. But the question was you wouldn't
8 have any reason to disagree with the fact that if
9 Ms. Miller said this was the reason she was away from
10 the post that that was the reason?

11 A I don't recall her saying that.

12 Q But do you have any evidence to the
13 contrary?

14 A No.

15 Q Okay. And if somebody were going to be sick
16 at their station, would that be a reason to leave in a
17 rush?

18 A You still have a responsibility in that EC
19 to make sure that that is -- somebody is, you know --
20 somebody is there. Yes. Okay. Yes. But you have to
21 let somebody in that area know or you make that phone
22 call.

23 Q Right. I understand that. But my question
24 is just if someone felt like they were going to be
25 imminently sick at their station, with a specific one,

1 which I'm assuming has line of sight to patients,
2 correct?

3 A When the patients come in, yeah.

4 Q So if someone was going to be sick at that
5 station, should they immediately rush to try to not be
6 sick in front of patients, or should they stay and
7 risk being sick in front of patients to make the phone
8 call?

9 A I would notify who's standing there, which
10 is always a nurse. If that was the case, then you let
11 them know right then.

12 Q Do you know who the nurse was?

13 A So, I mean, yeah. If you're going to get
14 sick, but you also have to make sure coverage is
15 there.

16 Q And do you know which nurse was there on the
17 date of this incident?

18 A I want to say Angela, but I can't -- I don't
19 recall what her last name is.

20 Q And was Angela the one that was asking where
21 she went?

22 A Yeah. Said there was nobody back there.

23 Q Is there a record of that statement that
24 Angela gave?

25 A I'm sure. I know that Ashley, my coworker,

1 spoke with her.

2 Q Have you ever seen a written statement from
3 Angela regarding that incident?

4 A I have not personally, no.

5 Q Did you ever speak with Angela yourself
6 about that incident?

7 A No. Ashley spoke to her.

8 Q So any information about Angela's potential
9 statement you heard from somebody else?

10 A From my coworker, the other supervisor that
11 we work hand in hand, yes.

12 Q And then you said there was another issue
13 with wrong registration. Could you go into a little
14 bit more detail about what that situation entailed?

15 A When a patient arrives, their job is to do
16 three identifiers, okay? Name, date of birth,
17 address, phone number, whatever you have to do to
18 identify that you have the correct patient. You
19 arrive that patient. When you go back with them, you
20 know, with the wristband, you again say to the
21 patient, "Give me your name, date of birth," to
22 identify that you have that correct patient. That's
23 standard protocol, so...

24 Q And in specifics, what was the issue with
25 the situation involving Ms. Miller? Do you remember

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1 the facts surrounding that?

2 A Yeah. We have plenty of documentation. We
3 document in our investment trackers, RLs are put into
4 the system when it's a wrong reg like that, you know.
5 And we're held accountable to answer to that and to
6 make sure, you know -- to help improve that process.
7 It's a no-brainer to do three identifiers.

8 Q So you're saying that the issue involving
9 Ms. Miller was involving these identifiers?

10 A Well, you can't get a correct reg unless you
11 identify all -- at least three identifiers. If you
12 cannot do all three identifiers, it is up to you to
13 make that as a new patient. Because you know why?
14 You don't want the wrong patient because that can lead
15 to life or death.

16 Q Right. And I understand that. I'm just
17 asking specifically, not generally, the practice. I
18 understand why the practice is in place. I'm asking
19 specifically, do you remember any facts about the
20 instance involving Ms. Miller specifically that you
21 were a part of the meeting for the write up?

22 A She's done several different things. I
23 can't even remember all.

24 Q So you're just saying there were several
25 issues?

1 A Several different things.

2 Q But you can't recall specifics on those?

3 A Well, one time she registered the patient in
4 for an X-ray and did the wrong body part. Do I
5 remember when? No, I don't remember. Has she banded
6 the wrong patient? Yes. She has banded the wrong
7 patient.

8 Q And those were all write ups?

9 A I don't recall, but I'm sure they were.

10 Q And do you recall if Ms. Miller signed those
11 write ups?

12 A I don't recall. Typically, she does not.
13 Anytime I've been there, she doesn't. And they have
14 the right. If they don't want to, they don't have to.
15 You can't force somebody.

16 Q Is there any repercussion for not signing
17 one of those?

18 A No, no.

19 Q And we discussed earlier that you didn't
20 look over Ms. Miller's employment file prior to your
21 start date?

22 A No.

23 Q Okay.

24 A I have 22 employees. I'm not going --
25 charts. Again, I base my own opinions. Somebody

1 could say something to me about somebody. I base my
2 own opinion.

3 Q Kind of switching gears for a moment. If
4 someone has a complaint with another employee or
5 manager, could they bring that complaint to you?

6 A You said if -- could you say that again?

7 Q Yeah. If one of your employees has a issue
8 with a coworker or another manager, could they bring
9 that complaint to you?

10 A They could, you know.

11 Q Has anyone ever complained to you about
12 coworkers or managers during your time there?

13 A Well, you're talking all different age
14 groups. There's all kinds of things all the time, you
15 know.

16 Q So there have been complaints just
17 generally?

18 A Yeah. Like, "So-and-so's doing this," or,
19 "So-and-so's doing," you know. It's just typical, you
20 know.

21 Q Has Ms. Miller ever brought any complaints
22 to you?

23 A I don't recall her. I don't recall. You
24 mean concerning another employee, correct?

25 Q Yes, correct. Yes.

1 A Yeah. Not that I can recall.

2 Q Has she ever brought any other concerns to
3 you?

4 A I just recall not long ago that she came to
5 me and was like, "I didn't get my vacation. I didn't
6 get my vacation." And I'm like, "Calm down. Calm
7 down." And she did get her vacation. So, you know,
8 I'm like, "You need to look a little closer because
9 you did get all your vacation days that you
10 requested."

11 Q And do you know the date of this
12 interaction?

13 Q Oh, it was just prior to her going -- a
14 couple weeks before she was going out on vacation.
15 Maybe even four weeks before, because we're four weeks
16 out on our schedules.

17 Q Do you know if Ms. Miller has had issues
18 with her vacation time in the past?

19 A No. We're very accommodating. Very, very
20 accommodating. As long as we're fully staffed, which
21 everybody knows. A lot of people -- I mean, I'm
22 thankful I'm fully staffed in my area, but there's a
23 lot of areas that are still struggling to get
24 employees back since COVID and that. No. We're very
25 accommodating. I want my vacation time.

1 Q That is very fair.

2 A You know, so why would I deny somebody else?

3 Q That is very fair. Do you know if Ms.
4 Miller has ever had any issues with her FMLA time
5 while she's been working at Beaumont?

6 A Not that I'm aware of. Again, that would be
7 the specialist that you would need to reach out to.

8 Q What is Ms. Miller's current role within the
9 PAR?

10 A She's a patient access register.

11 Q Is she assigned to a particular department?

12 A Yeah. Patient access registration. That's
13 registration. It's --

14 Q Well, with it -- so within that, I guess I
15 need to understand a little bit better. So within
16 patient access registration, there are specific posts
17 that people get assigned to, right?

18 A That would be our EC arrival. And then in
19 our back area, there's three desks. So what happens
20 is after the patients been arrived, the physician has
21 seen the patient, then our registers that are back,
22 you know, in our "complete areas" what we call it,
23 they will go bedside to the patient. And that's when
24 a second confirmation is done. You know, they go over
25 that patient's name, date of birth, making sure

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1 address is correct, getting insurance information from
2 them and so on.

3 Q You said that's for the EC?

4 A That is correct. And then we do have some
5 scheduled services that are usually our cardiology and
6 that. They -- we have another one. It's kind of hard
7 to explain, but we have another area where the people
8 who are working in complete also do scheduled
9 services, which usually we only have maybe 10, 15 of
10 them a day for the cardiology. And then we do a
11 couple clinics, too. And then we also do have our
12 surgery area, too, that we do have.

13 Q So which of those areas does Ms. Miller work
14 in?

15 A She works on all three.

16 Q Is that the standard for all employees?

17 A Well, the one that works up in surgery,
18 she's been here, like, 20 plus years, so she gets the
19 surgery. She's she got that surgery area. Sheryl
20 does the days that she has off, or if she's on
21 vacation, Sheryl takes up that. Because most of them
22 don't like to work up there because it's boring,
23 really, but...

24 Q So Sheryl kind of moves between these three
25 departments?

1 A Mm-hmm.

2 Q Do the --

3 A It's one department, but three areas.

4 Q Right. These three areas, sorry. The term
5 of --

6 A It's okay.

7 Q So between these three areas, Sheryl moves
8 depending on the schedule needs?

9 A Typically, one day a week she's working up
10 in surgery. Sometimes two. Like, I think this week
11 she's working two because the surgery girl's off. So
12 she always covers hers. And then most of the time
13 she's down on, you know, our bottom floor arrival and
14 complete.

15 Q Do other employees move around between these
16 areas as well in the PAR?

17 A There's a -- some of the -- some of the
18 newer ones, they may. Like, if Sheryl's not available
19 and say she's on vacation and our other surgery girl's
20 on vacation, a couple of them will. A lot of them,
21 like I said, they were like, "Go ahead. You can have
22 it." Because it's kind of boring up there. They like
23 that fast-paced moving kind of thing.

24 Q For the most part, most of the PAR employees
25 stay in that downstairs EC?

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1 A Correct.

2 MR. SHEAROUSE: Okay. We could go off
3 the record for just a moment.

4 THE REPORTER: Okay. We are now off
5 the record for a break, 11:10 a.m.

6 (Off the record.)

7 THE REPORTER: All right. We're back
8 on the record. It's 11:10 a.m.

9 BY MR. SHEAROUSE:

10 Q Okay. I'm going to share a screen real
11 quick and let me know if you can see that okay.

12 MS. CULBERSON: Austen, can you just
13 zoom in? Sorry. My eyes are terrible.

14 MR. SHEAROUSE: Yeah. No. You're
15 good. I'll get it a little bigger here.

16 MS. CULBERSON: Thank you.

17 MR. SHEAROUSE: I'll scroll up and
18 down.

19 BY MR. SHEAROUSE:

20 Q So you see this is an email dated on
21 Beaumont Miller 000486. Emails are dated between
22 August 16th, 17th, yeah. August 16th and 17th.

23 MS. CULBERSON: And, Renee, just take
24 your time to read it. Let Austen know if you need him
25 to scroll up or down.

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1 A Oh, I totally remember all this.

2 Q And so this situation was involving
3 Ms. Miller's FMLA, correct?

4 A Ms. Miller called me at 3 a.m. in the
5 morning. She was calling off. She said to me that
6 she was calling off FMLA. Her husband wasn't doing
7 well. So I'm like, "No problem." Of course, 3 a.m.
8 now I'm up for the day and always -- I always go and
9 document it right away in our investment tracker, and
10 then we also have an attendance tracker. And I'm
11 like, "Her FMLA expired," you know, and that was it.

12 Q And you said that you record this in the
13 investment tracker?

14 A Yeah.

15 Q Do you happen to have a copy of what you
16 recorded in the investment tracker on this particular
17 date?

18 A Oh, I'm sure I can -- I'd have to go back
19 and look for it.

20 MS. CULBERSON: Austen, the investment
21 tracker has been produced in discovery, so I'm happy
22 to point you to the --

23 MR. SHEAROUSE: Yeah. Could you --

24 MS. CULBERSON: -- if you need it.

25 MR. SHEAROUSE: Yeah. If you could

1 show me what Bates number that was. That'd be great.

2 MS. CULBERSON: Yeah. So do you want
3 the Bates number just for this timeframe?

4 MR. SHEAROUSE: Yeah. Just for this
5 timeframe is fine.

6 MS. CULBERSON: So it's on Bates 582.

7 MR. SHEAROUSE: Thank you.

8 BY MR. SHEAROUSE:

9 Q And so you recorded that immediately after
10 this conversation with Ms. Miller?

11 A That's the first thing because, you know --
12 so with us being supervisors, we're 24/7, okay?

13 Q Mm-hmm.

14 A Hospitals never close down.

15 Q Right.

16 A So if I'm not on call, then my co-worker's
17 on call. I was on call. So I got that page. I
18 answered my page. She called off stating FMLA. Her
19 husband wasn't doing well. Hung up the phone. Of
20 course, I have to get my laptop because I need to
21 document what was just said and everything, and I had
22 to find coverage, okay?

23 Q Mm-hmm.

24 A So I've got three hours to find someone to
25 take up that 6 o'clock a.m. shift. So I have to fill

1 that shift. And upon filling in my information, I'm
2 like, "Her FMLA is expired for her husband. She
3 don't." Typically when they call off, they only have
4 to call off FMLA. They don't have to tell me what
5 FMLA. It's not my business, but she happened to that
6 day. I just want to note I did not give her a point
7 or anything for that. I used it as an FMLA day, okay?

8 Q And do you happen to know what area
9 Ms. Miller typically worked in prior to your start of
10 employment with Beaumont?

11 A Oh, you mean where she worked prior?

12 Q Yeah. What area within the PAR would she
13 have -- that she typically worked in? Would you have
14 any knowledge on that?

15 A I mean, I -- in this area, you know? I know
16 when I first came, we did have imaging and then we had
17 the Breast Care Center, but that all went away.

18 Q So that's permanently closed down?

19 A It's not closed. They ended up -- they
20 ended up -- there's a manager that took over that area
21 and they split it up, I should say that. How -- they
22 split it up. So imaging and the Breast Care Center
23 went over to, you know, imaging area and then EC only
24 took up cardiology and EC.

25 Q And do you know when that division took

1 place?

2 A Oh, it's been a while. I don't recall.

3 Q Do you know what year, maybe?

4 A Maybe last year or the -- maybe -- I'm not
5 sure. I'm not sure. I'm not really sure.

6 Q But sometime after 2020?

7 A Sometime after. Well, yeah. Yeah.

8 MR. SHEAROUSE: Okay. I don't have
9 anything further at this time.

10 MS. CULBERSON: Okay. Let me just take
11 a few minute break here. Let me look at my notes.

12 MR. SHEAROUSE: Yeah. You want to just
13 say 11:25?

14 MS. CULBERSON: Sure. Yeah. That's
15 fine.

16 MR. SHEAROUSE: Okay.

17 MS. CULBERSON: And, Renee, when we go
18 on break, you can just mute yourself and turn off your
19 camera. We'll be back in a few minutes.

20 THE REPORTER: We're off the record at
21 11:17 for a break.

22 (Off the record.)

23 THE REPORTER: All right. We're back
24 on the record, and the time is 11:27 a.m.

25 MS. CULBERSON: Okay. I have no

1 questions.

2 MR. SHEAROUSE: Okay. Nothing further.
3 Thank you for your time, Ms. Carr. I appreciate you
4 taking time out of your day to answer a bunch of
5 questions.

6 THE WITNESS: Okay. Thank you.

7 THE REPORTER: Do we --

8 MS. CULBERSON: Thanks for --

9 THE REPORTER: Do we have any orders
10 for Renee?

11 MR. SHEAROUSE: I'll take a e-trans.

12 THE REPORTER: E-trans.

13 MS. CULBERSON: Same here.

14 MR. SHEAROUSE: Yeah. And I'll just
15 have a standing order for e-trans on --

16 THE REPORTER: On all of them? Okay.

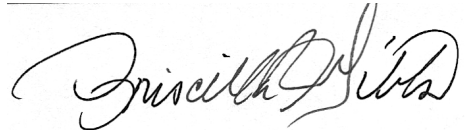
17 MR. SHEAROUSE: Yeah. It'll just make
18 it easy for you.

19 THE REPORTER: All right. Thank you.
20 We're now off the record. It's 11:28 a.m.

21 (Whereupon, at 11:28 a.m., the
22 proceeding was concluded.)
23
24
25

CERTIFICATE OF DEPOSITION OFFICER

I, PRISCILLA GIBBS, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.




PRISCILLA GIBBS

Notary Public in and for the
State of Michigan

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ANDEE WILCOX